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Defense Contract Management Agency




DEFENSE CONTRACT MANAGEMENT AGENCY
DEPARTMENT OF DEFENSE


Packaging Contract Review

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Scope: Packaging Contract Reviews are used to verify that all of the required data needed to package and ship supplies are stated in the contract, and are adequate to protect the item during shipping and storage.

Purpose: To train DCMA Technical Specialists how to review DoD contracts and what to look for to verify that adequate Preservation, Packaging, Packing and Marking (PPP&M) requirements are cited in the contracts. The Technical Specialist can then determine contractor compliance with the PPP&M requirements.

AGENDA

- Why We Review Contracts
- Common contractual errors
- Preservation
- Packing
- Marking
- Palletization
- Supplemental instructions
- Shelf-Life
- Section “D” Clauses
- Misc. Requirements
- Sample Contracts
- DD Form 1716
- Summary
- Quiz

A review of these Agenda topics will assist the Technical Specialist to better understand what to look for in a contract in order to know what is required of the contractor concerning Preservation, Packaging, Packing and Marking.

WHY WE REVIEW CONTRACTS

- To confirm that contracts include correct, complete, and adequate PPP&M requirements
- Look for the following references in a contract for the Packaging & Marking requirements:
 - MIL-STD-2073-1D (Military Packaging)
 - ASTM D 3951 (Commercial Packaging)
 - Special Packaging Instructions (SPIs)
 - MIL-STD-129-P (Marking)
 - Palletization Clause (can be in Section “F”)
 - Hazardous Material Safety Data Sheet (PSN, UN No. & Haz Class)
 - RFID DFARS Clause 252.211-7006 (Feb 2007)
 - Section “D” Clauses
 - AIM-BC 1 (AIT—bar coding)

Several Buying Activities include or just reference their own Packaging “Boiler Plate” Clauses. If not included in the contract, these clauses must be reviewed and understood by both the contractor and DCMA Technical Specialist.

Unfortunately not all Packaging Clauses are found in Section “D” as is the case with DLA contracts where the Palletization Clause can be found in Section “F”.

COMMON CONTRACT ERRORS

- Requirements stated in contract are not current
- Missing Packaging or Marking requirements
- Conflicting requirements
- Incomplete requirements
- Preservative called out on a painted or plated part
- Incorrect Quantity per Unit Pack (QUP)
- “ZZ” in the code, but no Supplemental data

Note: Use the DCMA Etools / Eforms version of DD Form 1716 to recommend packaging changes to the contract

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Without knowing an item’s configuration, size, weight, fragility and material content at the time a contract review is performed, prevents a thorough evaluation of the packaging prescribed to protect the procured item. However, some errors are obvious and can be detected early in the process.

DD Form 1716 can be found on the DCMA home page under Etools, Eforms web page.

A sample of conflicting requirements would be a reference to both Commercial Packaging and Level B Packing for the same item.

Buying Activity Packaging Specialists can be helpful when generating a DD Form 1716 and recommending the correct Packaging and Marking for an item they already manage. Don’t reinvent the wheel, they most likely already have the Packaging and Marking requirements in their database.

- **Military Preservation**
 - Specified by packaging requirements codes
 - MIL-STD-2073-1D is the latest revision
 - Navy uses MIL-STD-2073-1B & -2C Packaging Requirement Codes
- **Commercial Preservation**
 - Usually specified to comply with ASTM D3951
 - Provide safe delivery to destination
 - Withstand handling and storage for one year
 - ASTM D 3951 is a copyrighted document which can be purchased at www.astm.org

Level A Preservation is an older term no longer used. Now preservation is either Military, using Packaging Requirement Codes (PRCs) or Commercial.

Commercial preservation may also be called out as “Best Commercial Practice” or “Commercial Packaging I/A/W ASTM D3951.”

ASTM D3951 requires that items shall be clean, dry, wrapped and cushioned and placed in a container.

Unit pack quantity shall be one each unless items are small and lightweight, such as hardware. (If there is a QUP shown in the contract, it takes precedence.)

ASTM D 3951-98 is the latest revision. It does NOT specify MIL-STD-129 marking or bar coding. If MIL-STD-129 marking is required, it should be shown in the contract.

PACKING

- **Packing refers to the exterior shipping container**
- **Packing Levels A and B still exist**
- **Packing Level C has been changed to “Minimal Packing”**
- **Military Packing Codes are in MIL-STD-2073-1D, Table J.IX.**
- **Minimal Packing Codes are in MIL-STD-2073-1D, Table J.IXa**

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Most contracts will indicate a Packing Code and a Packing Level. Follow the description in the packing code definition as called out in MIL-STD-2073-1D to meet the Level of Packing called out.

Shipping containers that meet Packing Levels A & B can be found in MIL-STD-2073-1D, Table C.II. There are no Minimum Packing Level containers in this table

- **MIL-STD-129P W/Change 3 is latest revision**
 - Requires Item Identification markings on Unit, Intermediate & Exterior Containers.
 - Requires AIM BC 1 for Bar Code labels
 - AIM BC 1 is copyrighted & available at: www.aimusa.org
 - Requires a Military shipping Label (MSL)
- **MIL-STD-2073-1D, Table J.X, Special Marking Codes**
 - Code 03 = Method 50 Code 32 & 33 = Shelf-Life
 - Code 39 = ESD Code ZZ = Special Reqmt's.

MIL-STD-129P W/Change 3 is the standard used for Military Marking, whether it is Military Packaging or Commercial Packaging that is cited in the contract.

MIL-STD-129P W/Change 3 now has RFID requirements in paragraph 4.9

PALLETIZATION

- MIL-STD-147 superseded by MIL-HDBK-774
- DSC Columbus—Clause DC1636P001
 - Revision D, Dated 01277
- DSC Richmond—Clause D001450000
 - Revision B, Dated 01290
 - Both clauses available at:
www.dsccl.dla.mil/Offices/Packaging/NMWPMnotice.html
- All pallets destined for Depots or OCONUS must be heat-treated

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MIL-HDBK-774 states that it is to be used for guidance only, However, it is referenced in these DLA Palletization Clauses as a requirement.

All wood pallets for depot or Oconus will be Heat Treated.

- **Supplemental Packaging Instructions (SPIs)**
 - Shown below the MIL-STD-2073-1D PRC
 - May provide specific instructions
 - May designate a detailed drawing
 - May specify NSN of a reusable container
 - Navy SPIs available at <https://nll1.ahf.nmci.navy.mil/>

Examples of specific supplemental instructions: “Use a Type I, Class E, Style 3 bag IAW MIL-B-117” or “Apply P-2 preservative to bushings.”

Another example found in Navy contracts: Supplemental Packaging Instructions SPI 80132-012345678

- **Shelf-Life**
 - Shelf-Life Codes indicate the Type of Shelf-Life & the Shelf-Life period
 - Type I—Non-extendible, container markings will indicate item expiration date
 - Type II—Extendible, container markings indicate the inspection/test date
 - Shelf-Life Codes definitions are found in Appendix A of DoD 4140.27-M

Shelf life must be marked in accordance with MIL-STD-129P, paragraph 5.2.1.

Definitions of the Shelf-Life Codes can also be found in the superseded document MIL-HDBK-129, Table IV.

SECTION D CLAUSES

- Palletization requirements
- Direct Vendor Delivery (DVD) Bar Code requirements for DD Form 250
- Unique NAVICP requirements
 - Document CSD013, contains PPP&M requirements, available at <https://n111.ahf.nmci.navy.mil/>
 - Instructions for determining Packing Levels
 - Depot Level Repairable (DLR) Labels, available at <http://forms.daps.mil>
 - Instructions for obtaining GFM reusable containers
 - Special Materials Identification Code (SMIC) marking requirement (e.g. Level 1/Subsafe)

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Direct Vendor Delivery (DVD) bar coding of DD 250 requires bar coding of the; Transportation Control Number (TCN with the suffix), NSN, Routing Identifier Code (RIC such as S9G), Unit of Issue and Quantity shipped (a five-position code with zero fills to the left of the number)

Document number CSD013 is called out in Section D of NAVICP contracts. Use the website and go in as a COMMERCIAL (rather than government) user.

In Section D of NAVICP contracts Packing instructions are given. Minimal Packing is required for CONUC shipments, Level B Packing for OCONUS via air or Freight Forwarded and Level A Packing for OCONUS via vessel (ship).

In Section D of NAVICP contracts DLR Labels are required on packagings containing Depot Level Repairable items.

The SMIC is the two-digit suffix to the NSN. NAVICP Mechanicsburg SMICs requiring special markings are L1, S1, SS, C1, SB, CP, DO, DG, and VG. Containers must be marked with red or green lettering on four sides.

- **Look for indications that the item is Hazardous**
 - Proper Shipping Name, Hazard Class & UN Number
- **DSCP Cites commodity specification for clothing and textile items**
- **Individual Repair Parts Ordering Data (IRPODs)**
- **Packaging Drawings & Master Solicitations are available on procuring activity websites**
- **Modifications & Amendments to contract**

Items that are classified as hazardous will be identified in the contract and Hazardous Material Packaging will be cited in the contract based on the mode of transportation utilized.

Commodity Specifications might need to be obtained in order to know what packaging is required.

Buying Activity Packaging clauses and instructions are often found in their Master Solicitations.

Check Modifications and Amendments to the contract for changes in the Packaging and Marking.

SAMPLE CONTRACT—DLA

SECTION B

PREP FOR DELIVERY

PKGING DATA - MIL-STD-2073-1D,

**QUP = 001: PRES MTHD = 10: CLNG/DRY = 1: PRESV MAT = 00: WRAP MAT = XX:
CUSH/DUNN MAT = XX: CUSH/DUNN THKNESS = X: UNIT CONT = D3: OPI = O:**

INTRMDTE CONT = YY: INTRMDTE CONT QTY = AAA:

PACK CODE = U:

MARKING SHALL BE IN ACCORDANCE WITH MIL-STD-129.

SPECIAL MARKING CODE: 00 - NO SPECIAL MARKING.

**PALLETIZATION SHALL BE IN ACCORDANCE WITH DC1636P001 REV B DATED
99238**

**DOD BAR CODE MARKING REQUIRED IN ACCORDANCE WITH
MIL-STD-129 (LATEST REVISION) MARKING AND BAR
CODING IN ACCORDANCE WITH AIM BC1.**

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This “Prep for Delivery” requirement is the common form used for DLA contracts. It is given in Section B, just after the item ordering data.

Although the revision of MIL-STD-129 is not given, the latest revision as of the date the contract was signed is applicable.

Technical Specialists reviewing contract packaging requirements need to familiarize themselves with Packaging Requirement Code (PRC) interpretation.

Contractors frequently overlook the palletization clauses buried in between marking requirements.

MIL-STD-129 P is the correct revision to use with MIL-STD-2073-1D.



SAMPLE CONTRACT—ARMY

NSN: 2530-01-139-3748

NOUN: WHEEL,SOLID RUBBER

Description/Specs./Work Statement

TOP DRAWING NR: TDPL 12313083

DATE: 21-MAY-1998

Packaging and Marking

PACKAGING/PACKING/SPECIFICATIONS:

LEVEL PRESERVATION: Military

LEVEL PACKING: A

Inspection and Acceptance

INSPECTION: Origin ACCEPTANCE: Origin

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Army TACOM Packaging requirements are in Section B after the item description.

When a Special Packaging Instruction (SPI) is cited in the contract and not included, it can usually be obtained from the Buying Activity's website. The Packaging Specialist at the Buying Activity can also provide the SPI.

SAMPLE CONTRACT-NAVICP

HM	QUP	ICQ	PMT	CD	PM	WM	CUD	CT	UC	LP	IC	UCL	SP	MK	PACK	UNIT	PKWT	UNIT	PKCU	OPI
N	001	000	52	1	00	JA	GH	X	ED	A	00	0	0	EQQ			0.0		0.000	M

- NAVICP cites MIL-STD-2073-1B & 2C requirements in some contracts.
- The HM & LP Codes are no longer used
- The Pack Codes EQQ represent Level A,B & Minimal Packing

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This is a good example of a NAVICP contract Packaging Requirement Codes (PRCs).

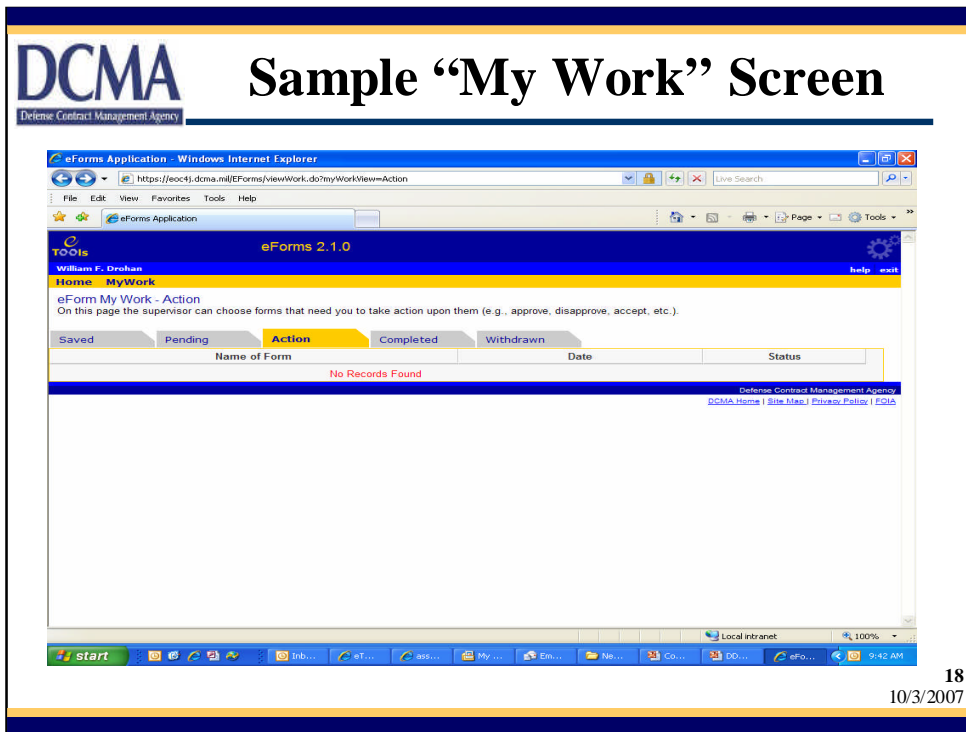
Technical Specialists can interpret these PRCs in MIL-STD-2073-1D or go on-line to <http://www.palm.saic.com>. Plug in the codes and get a definition of what the codes mean and what Military Preservation Method and materials are required.

DD FORM 1716

- When the contract data package has a PPP&M deficiency a DD Form 1716 is initiated to correct the deficiency.
- DD Form 1716 title, “Contract Data Package Recommendation/Deficiency Report.”
- DCMA Etools, Eforms includes DD Form 1716.
- When an Eforms DD Form 1716 is generated save a copy in the “My Work” section.
- The “My Work” section is a database for electronic Eform generated work.

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DCMA Etools, “My Work” is a helpful IT data base tool that enables the generator of the Eforms DD Form 1716 to save it for future reference and follow-up.



On this “My Work” page the supervisor can choose forms such as the DD Form 1716 that needs you to take action. (e.g. agree, disapprove, accept, etc.)

- **PPP&M Contract Deficiencies:**
 - **Missing Packaging or Marking requirements**
 - **Conflicting requirements**
 - **Incomplete or incomprehensible requirements.**
 - **Erroneous Packaging Requirement Code/s**
 - **Outdated or superseded specifications or clauses**
 - **Insufficient or excessive packaging cited in contract**
 - **Hazardous material not sufficiently identified**
 - **“ZZ” in the PRC but no special instructions included**

A thorough knowledge of Military Preservation, Packaging, Packing and Marking, and familiarization with Buying Activity Packaging procedures and requirements are necessary to identify contract PPP&M deficiencies.

Missing PPP&M requirements such as a Packaging Requirement Code and Special/Supplemental Packaging Instructions are the most common deficiencies.

DD Form 1716

- **PPP&M Contract Deficiencies Continued:**
 - ESD Packaging materials not cited when required
 - Commercial Packaging cited for OCONUS shipment
 - ASTM D 3951 W/O MIL-STD-129P
 - Inadequate Packing Level specified
 - Packaging materials specified will harm the item
 - Shelf-Life Codes erroneous or missing
 - Unit container not sufficient for the item
 - Incorrect Quantity Per Unit Pack (QUP)

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ESD sensitive items require ESD protective Packaging.

When Commercial Packaging requirements are cited using ASTM D3951, MIL-STD-129P must be referenced for the Military marking requirements.

Changes in the QUP should be discussed with the Buying Activity Item Manager before a DD Form 1716 is initiated. The Buying Activity maintains a database that provides them with information concerning how many of a given item are required to overhaul the next higher assembly. Also, Formula A. in B.4 of MIL-STD-2073-1D should be applied to determine the adequacy of the QUP before a DD Form 1716 is initiated.

- **Packaging Deficiency Description:**
 - Provide the location & Identify the PPP&M deficiency
 - Describe in detail why it is a deficiency
 - Use appropriate Packaging terminology but keep in mind that the initial recipient is not a Packaging Specialist
 - Consult with Buying Activity or DCMA Packaging Specialist for recommendations to correct the deficiency
 - State the recommended change clearly and also state the possible consequences to the item if the change is not made.

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It is important that the recommended PPP&M change is technically correct and adequately described using all applicable references even if the recommended change was provided by a Buying Activity Packaging Specialist or Item Manager.


Stating the consequences to the item for the failure to accept the recommended change will help influence the need to take immediate action to correct the deficiency and expedite the processing of the DD Form 1716.

DD Form 1716

- **Packaging Deficiency Description Continued:**
 - Annotate on the form that you are requesting a copy of the contract mod or any action that denies or accepts the recommended change/s
 - Forward the completed form to the applicable designated Points of Contact for the resolution of contract deficiencies
 - Past indicators necessitate follow-up action to ensure that the DD Form 1716 is being reviewed & worked on.

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Unfortunately, follow-up is necessary in some cases as the DD Form 1716 can be deemed a low priority even though the contractor and Quality Assurance Specialist could be holding up the shipment until resolution of the deficiency.



DD Form 1716 Entry

Tools

William Dohan

Home MyWork

DD Form 1716 Contract Deficiency Report 1.1

Today is Monday, August 06, 2007

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Contract Information

Contract ☒ DoD ☐ Non-DoD

* PIIN N00104 06 Q 9119

SPIIN 0001

Non-Dod Contract

Contractor Name Massey Ferguson Equipment, Reno, Nevada

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PCO and ACO Information

PCO Name John Deere

Activity Name NAVJCP

PCO E-Mail johndeere@amy.mil

ACO E-Mail cubcadet@dcma.mil

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Deficiency Information

* Select Deficiency (CTRL-click to select multiple deficiencies):

9) EFT/CCR Clause Missing From Contract

10) Inspection or Acceptance Missing or Unclear

11) Item Quantity Missing or Incorrect

12) Long Line of Accounting Invalid or Missing

13) Missing, Improper, or Conflicting Quality Requirements

14) Payment Instructions Missing/Ambiguous

15) Payment Office Incorrect

16) Shipping Address Incomplete

17) Technical Data Rights Missing, Improper, or Conflicting

Your Comments / Additional Info

Section D, page 8 of 9 states that commercial packaging should be used. This item is going to the supply depot to be shipped to Iraq, therefore the item should be packaged per Mil-STD-2073-1D.

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Submit this report.

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Make sure that you adequately describe the deficiency and recommended resolution in Section 3, Deficiency Information, Your Comments/Additional Info block. See slide 24 for a sample.

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DD Form 1716

- **Sample of Comments/Additional Information:**

On page 2 of the contract the Cushioning Code in the MIL-STD-2073-1D Packaging Requirement Code for Line Item 0001 is "ZZ." This Code indicates that there are special cushioning requirements that are stated in the contract. However, the special cushioning requirements are not stated in the contract. Recommend that the contract be modified to include the special cushioning requirement "item is to be sandwiched between two pieces of ASTM D 4727 Domestic fiberboard" as discussed with NAVICP Packaging Specialist John Doe, (215) 123-4567. This cushioning will provide the rigidity needed to ensure the integrity of the gasket and prevent item failure. A copy of the contract modification is requested to be forwarded to the originator of this request.

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Ideally, this is the kind of information that should to be in the Comments/Additional Information block in Section 3 of the Eforms DD Form 1716 to ensure the timely processing and correction of this contract deficiency.

It adequately describes the deficiency and recommends the correct cushioning requirements based on a discussion with the Buying Activity Packaging Specialist who pulled the information from his Packaging database for the item.

Summary

- A thorough Contract Review will help eliminate Packaging & Marking Discrepancies that may occur do to erroneous or missing contract requirements.
- It is necessary to know where to look for Packaging & Marking, & what to look for in a contract.
- Understanding the Packaging & Marking contract requirements results in a better inspection and acceptance process.
- Document all contract PPP&M deficiencies on DD Form 1716

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A well written contract is one that specifies and includes all of the necessary Preservation, Packaging , Packing and Marking requirements that ensures item protection during shipment and storage.

Initiating a DD Form 1716 is the tool to use to ensure that the PPP&M deficiencies are identified, investigated and resolved.

1. What form is used to identify and resolve contract Preservation, Packaging, Packing or Marking deficiencies?

- a) DD Form 2073**
- b) DLA Form 0812**
- c) DD Form 1716**
- d) Corrective Action Request**

Answer: c) DD Form 1716

2. What is Type I Shelf-Life?

- a) Non-Extendible
- b) Extendible
- c) Breakable
- d) All of the above

Answer: a) Non-Extendible

3. What version of MIL-STD-2073 is the most current and should be used on all new contracts?

- a) 1B
- b) 2C
- c) P change 3
- d) 1D

Answer: d) 1D

4. In what specification are Marking and Labeling requirements found?

- a) MIL-STD-774**
- b) MIL-STD-129P**
- c) MIL-STD-2073-1D**
- d) MIL-HDBK-774**

Answer: b) MIL-STD-129P (Military Marking for Shipment and Storage)

5. All pallets shipped to a Depot or an OCONUS destination are required to be Heat Treated?

- a) True**
- b) False**

Answer: a) True